

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

CRISTINA BENTO,
Plaintiff

v.

**CITY OF PAWTUCKET, by and through
its Finance Director, Joanna L’Heureux,
and CRAIG LETOURNEAU, alias,
individually and in his official capacity as a
Pawtucket Police officer,**
Defendants

C.A. No. 1:20-cv-00444-MSM-PAS

DEFENDANTS’ MOTION TO EXTEND PRE-TRIAL DEADLINES

Now come the Defendants and move for an extension of all pre-trial dates. Currently, factual discovery closes on August 29, 2022. Defendants request that factual discovery be extended by an additional ninety (90) days to November 28, 2022, and that all other pre-trial dates be extended in conformity with the factual discovery date extension. Defendants state as a reason that, although the Parties have made a significant progress on written discovery, the volume of material Defendants have to review has slowed the pace. In addition, the parties have identified several disputes concerning objections and responses and are committed to resolving all or most without seeking the Court’s intervention.

WHEREFORE, Defendants respectfully request that the pre-trial dates be extended an additional ninety days (90) days. Specifically, it is requested that that Factual Discovery be extended to November 28, 2022; Plaintiff’s Expert Disclosures be extended to December 27, 2022, Defendants’ Expert Disclosures to be extended to January 25, 2023, and Dispositive Motions be extended to February 26, 2023.

Defendants,
By Their Attorneys,

/s/Marc DeSisto
Marc DeSisto (#2757)

/s/ Kathleen A. Hilton
Kathleen A. Hilton, Esq. (#9473)

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CERTIFICATION OF SERVICE

I hereby certify, that on this 29th day of August 2022, I filed and served this document through the electronic filing system upon the following parties:

Shannah Kurland, Esq. (#9186)
skurland.esq@gmail.com

The document electronically served is available for viewing and/or downloading from the Rhode Island Judiciary's Electronic Filing System.

/s/ Kathleen A. Hilton
Kathleen A. Hilton